COMMENTS ON THE DRAFT FISH MANAGEMENT PLAN (APRIL 10, 1999)

Appendix H

Prepared for:

SANTA YNEZ RIVER CONSENSUS COMMITTEE

Prepared by:

SANTA YNEZ RIVER TECHNICAL ADVISORY COMMITTEE

October 2, 2000

STATE OF CALIFORNIA-THE RESOURCES AGENCY GRAY DAVIS, *Governor*

DEPARTMENT OF FISH AND GAME
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June 25, 1999

Ms. Jean Baldrige, Senior Fisheries Consultant
Entrix
590 Ygnacio Valley Road, Suite 200
Walnut Creek, California 94596

Dear Ms. Baldrige:

The California Department of Fish and Game (Department) has reviewed the Santa Ynez River Fish Management Plan (Plan). The Department offers the following comments for your consideration.

Overall, the plan describes numerous options that will facilitate meeting the Department's goal of restoring the Santa Ynez River's steelhead population. The Department strongly supports those options providing for restoration and enhancement of habitat conditions in the main stem Santa Ynez, and its tributaries downstream from Bradbury Dam. We encourage continued evaluation of those options that would reestablish steelhead populations upstream of Bradbury Dam. We understand the above dam options have various institutional and technical issues. These issues must be addressed before the above dam option can be considered a viable, integral component of steelhead restoration in the Santa Ynez River (SYR). The Department does not, however, support using artificial means to supplement steelhead populations, such as hatchery programs and spawning channels. The following is detailed discussion of the alternatives we believe would best serve our steelhead restoration goals. We have provided a summary chart of our comments on options 1-36 at the end of this letter.

HILTON CREEK

Restoration and enhancement of steelhead rearing habitat, especially during the warmer spring, summer and fall periods, would substantially increase the potential for steelhead restoration in the SYR. Flow augmentation in Hilton Creek is an achievable, effective means of directly increasing the quality and quantity of rearing habitat downstream from Bradbury Dam. Eliminating existing barriers to fish passage within Hilton Creek would compound the benefits obtainable from flow augmentation by potentially linking spawning habitat with increased rearing habitat effecting increased steelhead production. As such, we have identified flow augmentation and barrier removal in Hilton Creek as high priority alternatives.

MAIN STEM : Flow augmentation and Channel restoration

Flow augmentation and channel restoration in the main stem is another management action potentially improving the quantity and quality of spawning habitat. The flow regime and water availability required to achieve the intended improvements, and the technical and institutional means of providing the necessary regime, will require further evaluation. Such evaluations should be integral components of the Fishery Management Plan.

HABITAT ENHANCEMENT

Habitat enhancement alternatives, specifically alternative numbers 8, 9 and 10 ,should be considered high priority actions. These actions would not only increase habitat diversity and complexity, but also substantially increase the potential benefits associated with increased flows. As such, we recommend that alternative number 8 be added to the Plan. Riparian restoration would strengthen banks, providing structure necessary to develop pools, undercuts and rootwad type habitats, and develop sources of terrestrial based food supplies and woody debris. While this alternative may not directly improve habitat by shading such a wide river and reducing water temperatures, a healthy riparian forest could provide sufficient shading when flows are low and follow the stream bank. A healthy riparian corridor is essential to the integrity of a healthy fluvial system and should be targeted in a plan intended to improve instream habitat conditions, and overall system health. The Bureau of Reclamation(BOR) WR94-5 Vegetative Management Study (not yet released) would provide some of the analysis needed to develop riparian vegetation enhancement possibilities.

Steelhead spawning and rearing habitat may also be increased by extending the channel of lower Hilton Creek, as represented in alternative number 33. If feasible, the channel extension would further capitalize on flow augmentation in Hilton Creek. As a participant in the Hilton Creek Working Group, the Department supports the concept of a channel extension but also acknowledges that ongoing evaluations need to be completed to determine if sufficient surficial flow of suitable quality can be maintained in either of the proposed channel alignments to provide the desired habitat benefit for steelhead. As such, we have given this management alternative a conditional high priority status.

Fish passage is another critical component of anadromous fish habitat. Removing barriers in tributaries presently or potentially possessing suitable rearing and spawning habitats is an effective, direct means of increasing habitat availability, per the discussion above on Hilton Creek. A discussion of the other tributaries downstream from Bradbury Dam, relative to potential restoration, including barrier removal should be included in the Plan. The Department has provided extensive input on which tributaries might be suitable, and as a part of the Working Group will continued to help develop this option.

Low flow conditions in the main stem can present passage problems to both upstream and downstream migration. Flow augmentation could minimize or eliminate most fish passage problems in the main stem downstream of Bradbury Dam.

Fish passage around Bradbury Dam (Alternative 17) should be considered a viable option pending the outcome of the following considerations: 1) actions taken downstream, 2) evaluation of the technical feasibility of providing successful passage, and 3) evaluations of the potential impact of reintroducing steelhead into the upper system. Trapping and trucking fish over an existing impediment to migration such as Bradbury Dam is not considered to be in conflict with the Department's Steelhead Policy, per the California Steelhead Management Plan. Of the five trap and truck options (Alternative 35,36,39,40 and 46) , however, there is some confusion on our part as to how these differ, and why some are acceptable and others are not. For the discussion of trap and truck options to go further, it will be important to distinguish among each of these alternatives, with the advantages and disadvantages clearly delineated.

Thank you for the opportunity to review this document. If you have any questions regarding our comments, please contact Ms. Morgan Wehtje, Department of Fish and Game, 1933 Cliff Drive, Suite 9, Santa Barbara , California 93109, or by telephone at 805-491-3571.

Sincerely,

C. F. Raysbrook
Regional Manager

cc: Department of Fish and Game

Ms. Morgan Wehtje
Santa Barbara

Mr. Dwayne C. Maxwell
Long Beach

Mr. Bill Snider
Sacramento

Mr. Rob Titus
Sacramento

Mr. Maurice Cardenas
Santa Barbara

Alternative	Comment
1	Agree. Conjunctive use of water rights releases and Fish Reserve Account water will provide an increase in year-round spawning and rearing habitat.
2	Agree. Direct recharge of ground water will have uncertain benefits for fish habitat.
3	Agree. Managed flood controlled spills will have low biological benefit
4	Agree. Additional mainstem flow releases from the Fish Reserve Account will have an overall benefit to aquatic resources.
5	Agree. Reservoir surcharge will provide additional water for habitat maintenance
6	Agree. Purchase of water rights has limited potential
7	Agree. Option to recirculate water is not feasible
8	See specific comments in text. Should be included as an alternative
9	Agree. Option needs some discussion of possible drawbacks or habitat parameters of subject pools.
10	See number 9
11	Agree. Option should recognize future possibility of adding spawning gravels under a set of well defined conditions.
12	Agree. Conservation easements would require landowner participation.
13	Should include all known barriers on the lower SYR mainstem and extent of impediment to migration.
14	Agree. Breaching of SYR lagoon will have low biological benefit, and undetermined affects.
15	Agree. A fish ladder is not feasible at this time.
16	See 15
17	See specific text. Relocation while not in conflict with DFG policy may have "institutional" obstacles
18	See 17
19	DFG does not consider this option feasible. Wholescale removal would have the potential to harm Steelhead, and would have, at best, a temporary effect on targeted warmwater species. All requests to remove fish species from the SYR should be reveiwed by NMFS, USF&WS, and DFG.
20	Refer to current DFG angling restrictions on the SYR

21	Not an acceptable option. DFG policy on native trout populations needs to be addressed prior to planning this management alternative.
22	Broodstock supplementation should not be considered at this time.
23	See 22
24	Currently in review by NMFS and DFG to determine feasibility.
25	Agrees. Purchase of water rights for resource needs would have low success potential.
26	DFG is currently evaluation operation limits of pumping water from Cachuma into Hilton Creek. DFG supports the watering of Hilton Creek by the siphon method.
27	Agree.
28	Agree.
29	The plan should identify tributaries and their proposed instream structures or enhancement benefits. The proposed structures should be prioritized based on cost benefit or other considerations. A streambed alteration agreement will be required for these proposals.
30	Agree. Refer to number 29 for additional comments
31	Supports conservation easement participation by landowners
32	Refer to Number 29
33	Refer to Number 24
34	Refer to Number 24
35	See specific text.
36	Agree
37-46	See specific text.